

EXHIBIT C

John Francis Myklusch

11/03/2006

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08:47:27

UNITED STATES DISTRICT COURT

08:47:27

FOR THE DISTRICT OF MASSACHUSETTS

08:47:27

08:47:27

IN RE:

08:47:27

08:47:27

SONUS NETWORKS, INC.,

08:47:27

LITIGATION

08:47:27

Civil Action No.

08:47:27

04-10294-DPW

08:47:27

Lead Case

08:47:27

08:47:27

9:30 a.m.

November 3, 2006

08:47:27

399 Park Avenue

08:47:27

New York, New York

08:47:27

DEPOSITION of JOHN FRANCIS MYKLUSCH, a
Witness in the above entitled matter, taken
pursuant to Notice, before Stephen J. Moore, a
Registered Professional Reporter, Certified
Realtime Reporter, and Notary Public of the
State of New York.

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JOHN MYKLUSCH

14:44:33 2

case.

14:44:50 3

Q Mr. Myklusch, is it your

14:44:52 4

contention in this case that the restatement at

14:44:58 5

Sonus in July of 2004 was as a result of fraud?

14:45:00 6

A Revenue manipulation would be a

14:45:02 7

fraud, so yes, I think the primary driver is a

14:45:05 8

fraud at issue.

14:45:08 9

Q Are you aware of any facts

14:45:09 10

supporting such contention that there was

14:45:11 11

fraud?

14:45:14 12

A I know the broad strokes of the

14:45:17 13

case, but I do not know the exact details

14:45:18 14

behind the exact specific instances or frauds

14:45:20 15

that are alleged.

14:45:22 16

Q It's fair to say, is it not,

14:45:23 17

that you don't have any personal knowledge

14:45:24 18

about any of the allegations in the Complaint?

14:45:28 19

MR. CERA: Well, hold on a

14:45:29 20

second.

14:45:32 21

That's overbroad. Any of the

14:45:34 22

allegations like the Plaintiff purchased

23

Sonus securities?

24

I mean are you talking about the

25

underlying charging allegations of

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14:46:34 1

JOHN MYKLUSCH

14:46:38 2

Q (Continuing) -- whether you

14:46:40 3

have any personal knowledge of any of the

14:46:43 4

allegations in the Complaint?

14:46:50 5

A If your question is asking me

14:46:56 6

whether I am aware of the specific allegations

14:46:58 7

or any of the specific specifics of the case in

14:46:59 8

that layer of detail, then the answer is no.

14:47:00 9

Q Do you know who Peter Hemme

14:47:06 10

is?

14:47:08 11

A I believe Peter Hemme is the

14:47:13 12

Comptroller of Sonus.

14:47:14 13

Or was the Comptroller, I'm

14:47:16 14

relatively sure he's not today.

14:47:19 15

Q Do you have any personal

14:47:57 16

knowledge of any of the allegations that are

14:48:06 17

made against Mr. Hemme?

14:48:09 18

A I do not.

14:48:17 19

Q Who is the individual at BPI or

14:48:21 20

Trilogy who has primary oversight

14:48:22 21

responsibility for this litigation?

14:48:24 22

A How would you define oversight?

23

Q What do you understand by that

24

term?

25

A If you mean the ability to make